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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

In re: ) Case No.: 2:14-cv-01904-JCM-GWF  
Bistro Central, LV LLC, )  
Debtor. ) Bankruptcy Case No. 14-14931-ABL  
\_\_\_\_\_  
Bistro Central, LV LLC, ) Chapter 11  
Plaintiff, )  
v. )  
Unite Here Health, by and through its ) Adversary Case No.: 14-01145-ABL  
fiduciary, Matthew Walker, )  
Defendant. )

## **STIPULATION AND ORDER WITHDRAWING MOTION TO WITHDRAW THE REFERENCE**

Bistro Central, LV LLC, (the “**Debtor**” or “**Plaintiff**”) and Unite Here Health (“**UHH**” or “**Defendant**”), by and through their undersigned attorneys of record, hereby stipulate and agree to withdraw Defendant’s Motion to Withdraw the Reference (the “**Motion**”).

1 WHEREAS, on July 17, 2014, the Plaintiff filed a voluntary petition for relief under  
2 Chapter 11 of the United States Bankruptcy Code before the United States Bankruptcy Court  
3 for the District of Nevada (the “**Bankruptcy Court**”), Case No. 14-14931-ABL (the  
4 “**Bankruptcy Case**”);

5 WHEREAS, on September 26, 2014, the Plaintiff initiated that certain adversary  
6 complaint against the Defendant, Adversary Proceeding No. 14-01145-ABL (the “**Adversary**  
7 **Proceeding**”);

8 WHEREAS, on October 27, 2014, the Defendant filed its Motion seeking relief before  
9 this Court pertaining to the Adversary Proceeding;

10 WHEREAS, on January 27, 2015, the Bankruptcy Court confirmed the Debtor’s  
11 Chapter 11 Liquidating Plan (the “Plan”), which, among other things, resolved the Adversary  
12 Proceeding;

13 WHEREAS, on February 18, 2015, the Bankruptcy Court entered an order confirming  
14 the Debtor’s Plan; and

15 WHEREAS, as the Debtor’s Plan is now confirmed and the Adversary Proceeding  
16 resolved, the Motion is now moot. Accordingly, the parties desire to withdraw the Motion,  
17 which in turn, will allow the Bankruptcy Court to enter an order dismissing the Adversary  
18 Proceeding as agreed upon by the parties pursuant to the Plan.

19 NOW, THEREFORE, the Plaintiff and Defendant hereby stipulate and agree to the  
20 following, and concurrently seek this Court’s approval of the same.  
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1 IT IS HEREBY STIPULATED AND AGREED that the Motion is hereby withdrawn.  
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4 Date: March 24, 2015  
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7 /s/ Bryan A. Lindsey  
8 Samuel A. Schwartz, Esq.  
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12 Date: March 24, 2015  
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15 /s/ Daryl E. Martin  
Daryl E. Martin, Esq.  
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Wesley J. Smith, Esq.  
Nevada Bar No. 11871  
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19 Submitted by:  
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22 The Schwartz Law Firm, Inc.  
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25 By /s/ Samuel A. Schwartz  
26 SAMUEL A. SCHWARTZ, ESQ. #10985  
27 Attorneys for the Debtor/Plaintiff  
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17 IT IS SO ORDERED:  
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UNITED STATES DISTRICT JUDGE  
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23 March 27, 2015  
24 DATED: \_\_\_\_\_  
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